

Annual 47 C.F.R. § 64.2009(e) CPNI Certification EB Docket 06-36

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Annual 64.2009(e) CPNI Certification for 2009

Date filed: January 21, 2010

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Name of company covered by this certification: Tangent Information Services, Inc

Form 499 Filer ID: NEW FILER

Name of signatory: David Hayes

Title of signatory: Vice President, Finance

I, David Hayes, certify that I am an officer of Tangent Information Services, Inc. and acting as an agent of Tangent Information Services, Inc, that I have personal knowledge that Tangent Information Services, Inc. has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64,2001 et seq.

Attached to this certification is an accompanying statement explaining how Tangent Information Services, Inc. procedures ensure that it is in compliance with the requirements set forth in section 64.2001 et seq. of the Commission's rules.

Tangent Information Services, Inc. affirms that it has not taken any actions against data brokers in the past year nor have any pretexters attempted to access CPNI.

Tangent Information Services, Inc. affirms that is has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

David Haves

Vice President, Finance

Tangent Information Services, Inc.

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STATEMENT OF COMPLIANCE WITH CPNI RULES

Tangent Information Services, (the "Company") provides operator services and directory assistance and live agent solutions to locations in the Caribbean for hospitality customers and payphone customers.

The Company has elected to utilize or provide CPNI only for purposes that are permissible without customer approval in accordance with 47 C.F.R. § 64.2005. Accordingly, the Company currently does not use CPNI in a manner that requires customer approval and is not required to implement a system by which the status of a customer's CPNI approval can be established prior to the use of CPNI. Therefore, as permitted by the CPNI rules, the Company may use CPNI (1) to bill and collect for services rendered; (2) to protect rights or property of the Company, other-users-or other carriers from unlawful use. The Company does not share, sell, lease and otherwise provide CPNI to any unrelated third parties for the purposes of marketing any services.

The Company has implemented processes and procedures to train its personnel as to when they are and are not permitted to use CPNI. For instance, all Company employees are required to abide by the Company's CPNI Manual, which, inter alia, requires employees to maintain the confidentiality of all information, including CPNI, that is obtained as result of their employment by the Company. The Company's CPNI Manual also provides a comprehensive roadmap of how Company employees are required to use, maintain and disclose CPNI. Employees who violate the Company's CPNI Manual will be subject to discipline, including possible termination.

The Company does not currently engage in any large-scale coordinated sales and marketing campaigns. The Company does some limited marketing of new services to existing customers on a case-by-case basis. Records of these customer contacts are maintained in Company databases. Specifically, the Company utilizes an account management and trouble ticketing system that documents contacts with customers. These records are maintained for at least one year.

The Company ensures that it does not provide CPNI to any customer on an inbound call without proper customer authentication. The Company does not use, maintain or otherwise collection call detail information from its customers. The Company does not provide online account access for its customers.

Since the Company does not have passwords or back-up secret questions for lost or forgotten passwords and does not offer online account access, the Company is not required to notify customers of changes to these items. In the event of a breach of CPNI that is maintained by the Company, it will provide law enforcement with notice of such CPNI breach. After notifying law enforcement and unless directed otherwise, the Company will notify affected customers and will maintain a record of any CPNI-related breaches for a period of at least two years as required by the applicable FCC CPNI rules.

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